

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Periodic Reporting  
(Proposal Two)

Docket No. RM2020-7

CHAIRMAN'S INFORMATION REQUEST NO. 4

(Issued May 12, 2020)

To further assist the Commission in its evaluation of the Postal Service's proposed changes to analytical principles relating to periodic reports,<sup>1</sup> the Postal Service is requested to provide written responses to the following questions. The responses should be provided as soon as possible, but no later than May 19, 2020.

In Docket No. RM2015-7, the Postal Service stated that regular delivery time "includes the collection of mail from customers' receptacles. It does not include the collection of mail from street letter boxes. That time is included in another cost pool."<sup>2</sup> In the current docket, the Postal Service indicates that data on volumes "collected from customer's receptacles...is not included in any of the Postal Service's operational databases." Bradley Report at 8 n.9. The Postal Service explains that lack of such data made it impossible "to update this volume mean" for mail collected from customers' receptacles (customer collection mail volumes). *Id.*

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<sup>1</sup> Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Two), April 7, 2020 (Petition). See also Professor Michael D. Bradley, George Washington University, A Methodology for Updating the City Carrier Regular Delivery Variabilities\*, April 7, 2020 (Bradley Report).

<sup>2</sup> Docket No. RM2015-7, Library Reference USPS-RM2015-7/1, December 11, 2014, folder "Letter\_Route\_Report," file "City Carrier Street Time Study Report.pdf," at 21 n.6.

Questions 1 and 2 relate to a potential use of the existing databases as data sources for customer collection mail volumes. They should be answered in light of the statements quoted above.

1. In Docket No. PI2017-1, the Postal Service expressed interest in seeking to find “a reliable and defensible measure of customer collection volume using [the City Carrier Cost System (CCCS)] data.”<sup>3</sup> Specifically, the Postal Service stated that it would be beneficial to use the CCCS weighted data to accurately estimate customer collection mail volumes at the ZIP Code level.<sup>4</sup>
  - a. Please confirm that the Postal Service considered the CCCS in the current docket as a data source that would allow updating the volume mean for customer collection mail volumes.
  - b. If confirmed, please explain why use of such data was rejected and provide the results of any analysis that supported that decision.
  - c. If not confirmed, please explain why the Postal Service did not consider the CCCS data.
2. In Docket No. RM2019-6, the Postal Service used an annual operational study, the National Collection Point Management System (CPMS) density test, which “provides records of the volumes collected from collection points,” as a data source for the Special Purposes Routes collection model.<sup>5</sup>

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<sup>3</sup> Docket No. PI2017-1, Responses of the United States Postal Service to Questions 1-5 of Chairman’s Information Request No. 6, June 27, 2018, question 2 (Responses to CHIR No. 6). The CCCS is located in Docket No. ACR2019, Library Reference USPS-FY19-34, December 27, 2019 and Docket No. ACR2019, Library Reference USPS-FY19-NP22, December 27, 2019.

<sup>4</sup> See Docket No. PI2017-1, Interim Order, November 2, 2018, at 8 (Order No. 4869); Docket No. PI2017-1, Responses to CHIR No. 6, question 2.

<sup>5</sup> See Docket No. RM2019-6, Order on Analytical Principles Used in Periodic Reporting (Proposal One), January 14, 2020, at 18 (Order No. 5405).

- a. Please confirm that the National CPMS density test does not contain collection mail volumes retrieved from customers' receptacles.
- b. If confirmed, please discuss whether the Postal Service considered using any data from the National CPMS density test in the current docket as a proxy for collection mail volumes retrieved from customers' receptacles. Please provide the results of any analysis that supported the decision not to use data from the National CPMS density test as a proxy for customer collection mail volumes in the current docket.
- c. If not confirmed, please explain why these volumes were not used to update the volume mean for collection mail in the current docket.

By the Chairman.

Robert G. Taub